

Mr. Jimmie C. Hodges
Paducah Site Manager
Department of Energy
Post Office Box 1410
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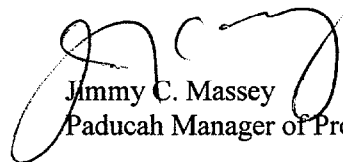
Subject: Paducah Environmental Management and Enrichment Facilities Evaluation Summary

Dear Mr. Hodges:

In accordance with Department of Energy Order 5480.21, *Unreviewed Safety Questions*, the enclosed Safety Evaluation Summary is submitted in partial fulfillment of the requirements of Section 10.e(4). This submittal represents the period from October 1, 1998, through September 30, 1999.

If you desire more information, please call Randy Scott at 441-5142.

Sincerely,


Jimmy C. Massey
Paducah Manager of Projects

JCM:lf
LTR-PAD/ETS-LF-99-0039

Enclosure: Safety Evaluation Summary

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SAFETY EVALUATION SUMMARY

October 1, 1998 - September 30, 1999

EM&EF 97-002 Deleasing of DOE Material Storage Areas

The issue analyzed in this "backward-looking" Safety Evaluation (SE) is the "as found" condition of material stored in Department of Energy (DOE) Material Storage Areas (DMSAs) evaluated against the authorization basis documentation in effect at that time. The issue had previously been identified as a potential unreviewed safety question (USQ) resulting from DOE's acceptance of responsibility for the DMSAs without sufficient information to adequately assess the need for further safety analysis documentation. DOE was notified that a potential USQ existed and interim controls were agreed upon. On July 21, 1998, the condition was reported as a USQ based on the results of non-destructive analysis (NDA) performed on an axial compressor stored in DMSA 31 in the C-333 process building. The extremely conservative NDA indicated that the compressor contained less than 1737 grams of ^{235}U at an assay of 1.157 wt%. On August 17, 1998, the compressor was removed from the area employing endorsed leased-facility nuclear criticality safety documentation and ownership was transferred back to the United States Enrichment Corporation. A request for approval of this USQ was sent to DOE September 13, 1999. The USQ was approved by DOE on September 16, 1999.

EM&EF98-041, Addendum 1 Relocation of Cylinders to C-745-T Cylinder Yard

The issue reassessed in this addendum to SE EM&EF 98-041 is the utilization of a portion of C-745-T Cylinder Storage Yard, a minimum distance of 900 feet from the site boundary. The construction and use of this yard was previously authorized by an evaluation against the '85 Safety Analysis Report and is no longer valid. The issue did not result in an USQ.

EM&EF98-078 Deleasing of DOE Material Storage Areas

The issue addressed in this SE is the "as found" condition of material stored in DMSAs evaluated against the current authorization basis. This issue constitutes an USQ since no approved documentation exists which stipulates controls implemented to preclude/minimize the probability of, or negate/mitigate the consequences of, an accidental criticality. A request for approval of this USQ was sent to DOE September 13, 1999. The USQ was approved by DOE on September 16, 1999.

EM&EF 98-084 Categorical Exclusion of Specified Procedures

The purpose of this SE is to analyze a category of procedures by which Human Resources/Labor Relations, Internal Audit, Business Management, Legal, and Public Affairs programs are conducted. With the exception of safety-related position qualifications, no direct or indirect impact upon the facility safety of the nonleased facility operations has been identified associated with these programs. The categorical exclusion of the specified procedures does not constitute an USQ.

EM&EF 99-040 Addition to the Criticality Accident Alarm System at C-746-Q

The issue analyzed in this SE is the addition of eighteen electronic horns in the C-746-Q and -Q1 buildings and the installation of an uninterruptible power supply feeding criticality accident alarm system clusters "AC" and "AD." The issue did not constitute an USQ.